

DAVIS POLK & WARDWELL LLP  
450 Lexington Avenue  
New York, New York 10017  
Telephone: (212) 450-4000  
Facsimile: (212) 701-5800  
Marshall S. Huebner  
Timothy Graulich  
James I. McClammy  
Stephen D. Piraino  
Erik P. Jerrard (admitted *pro hac vice*)

*Counsel to the Debtors  
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re:**

**GRUPO AEROMÉXICO, S.A.B. de C.V., et  
al.,  
Debtors.<sup>1</sup>**

**Chapter 11**

**Case No. 20-11563 (SCC)**

**(Jointly Administered)**

**AGENDA FOR SEPTEMBER 20, 2021 HEARING**

Time and Date of Hearing: September 20, 2021 at 1:00 p.m. (prevailing Eastern Time)

Telephonic Only Hearing: In accordance with General Order M-543 (“General Order M-543”), dated March 20, 2020, the Hearing will only be conducted telephonically. Any parties wishing to participate in the Hearing must make arrangements through CourtSolutions LLC. Instructions to register for CourtSolutions LLC are attached to General Order M-543. Please register with Court Solutions at [www.court-solutions.com](http://www.court-solutions.com).

Copies of Motions: A copy of each pleading can be viewed on the Court’s website at <http://www.nysb.uscourts.gov> and the website of the Debtors’ notice and claims agent, Epiq Corporate Restructuring, LLC at <https://dm.epiq11.com/aeromexico>.

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<sup>1</sup> The Debtors in these cases, along with each Debtor’s registration number in the applicable jurisdiction, are as follows: Grupo Aeroméxico, S.A.B. de C.V. 286676; Aerovías de México, S.A. de C.V. 108984; Aerolitoral, S.A. de C.V. 217315; and Aerovías Empresa de Cargo, S.A. de C.V. 437094-1. The Debtors’ corporate headquarters is located at Paseo de la Reforma No. 243, piso 25 Colonia Cuauhtémoc, Mexico City, C.P. 06500.

**I. MATTERS GOING FORWARD:**

1. ***Seventeenth Omnibus Claims Objection.*** Debtors' Seventeenth Omnibus Claims Objection to Proofs of Claim (Misclassified Unliquidated, Wrong Debtor, Incorrectly Classified, No Liability, Satisfied, Amended, Duplicate, Reduced, and Foreign Currency Claims) [ECF No. 1593].

Objection Deadline: September 17, 2021 at 4:00 p.m. (prevailing Eastern Time)

Responses Received:

- A. The Debtors have received informal comments from various claimants.

Related Documents:

- A. Affidavit of Service of Angharad Bowdler of Epiq Corporate Restructuring, LLC [ECF No. 1645].
- B. Affidavit of Service of Angharad Bowdler of Epiq Corporate Restructuring, LLC [ECF No. 1646].

Status: This matter is going forward. The Debtors will file a revised proposed order under certificate of no objection before the hearing, removing and modifying their objection to certain claims.

2. ***Eighteenth Omnibus Claims Objection.*** Debtors' Eighteenth Omnibus Claims Objection to Proofs of Claim (Wrong Debtor, Incorrectly Classified, Foreign Currency, Amended And Duplicate, and/or Reduced Claims) [ECF No. 1594].

Objection Deadline: September 17, 2021 at 4:00 p.m. (prevailing Eastern Time)

Responses Received:

- A. The Debtors have received informal comments from various claimants.
- B. Response to the Eighteenth Omnibus Claims Objection, Claim #13386 filed by Elmer Charles Jubb IV [ECF No. 1665].
- C. Response To the Eighteenth Omnibus Claims Objection filed by Elmer Charles Jubb IV [ECF No. 1699].
- D. Opposition To Debtor's Eighteenth Omnibus Claims Objection to Proofs of Claim filed by Kyle Tucker [ECF No. 1713].

- E. Opposition To Debtor's Eighteenth Omnibus Claims Objection to Proofs of Claim filed by Teresa Mkhitarian [ECF No. 1714].

Related Documents:

- A. Affidavit of Service of Angharad Bowdler of Epiq Corporate Restructuring, LLC [ECF No. 1645].
- B. Affidavit of Service of Angharad Bowdler of Epiq Corporate Restructuring, LLC [ECF No. 1646].
- C. Affidavit of Service of Angharad Bowdler of Epiq Corporate Restructuring, LLC [ECF No. 1649].

Status: This matter is going forward. The Debtors will file a revised proposed order under certificate of no objection before the hearing, removing and modifying their objection to certain claims.

3. ***Rejection Motion.*** Debtors' Motion for Entry of an Order Authorizing Debtors To Reject that Certain Aircraft Lease [ECF No. 1614].

Objection Deadline: September 13, 2021 at 4:00 p.m. (prevailing Eastern Time)

Responses Received: None.

Related Documents:

- A. Affidavit of Service of Angharad Bowdler of Epiq Corporate Restructuring, LLC [ECF No. 1651].
- B. Certificate of No Objection Regarding Debtors' Motion for Entry of an Order Authorizing Debtors To Reject that Certain Aircraft Lease [ECF No. 1723].

Status : A Certificate of No Objection has been filed. To the extent a hearing is necessary, this matter is going forward on an uncontested basis.

4. ***Clover 9019 Motion.*** Debtors' Motion for an Order Pursuant to 11 U.S.C. § 105 and Fed. R. Bankr. P. 9019 Approving an Unsecured Claim Settlement by and between the Debtors and the Clover Parties [ECF No. 1655].

Objection Deadline: September 13, 2021 at 4:00 p.m. (prevailing Eastern Time)

Responses Received: None.

Related Documents:

- A. Affidavit of Service of Angharad Bowdler of Epiq Corporate Restructuring, LLC [ECF No. 1668].
- B. Certificate of No Objection Regarding Debtors' Motion for an Order Pursuant to 11 U.S.C. § 105 and Fed. R. Bankr. P. 9019 Approving an Unsecured Claim Settlement by and between the Debtors and the Clover Parties [ECF No. 1724].

Status: A Certificate of No Objection has been filed. To the extent a hearing is necessary, this matter is going forward on an uncontested basis.

5. ***Assumption Motion.*** Debtors' Motion for Entry of an Order Authorizing Debtors To Assume Certain Aircraft Leases [ECF No. 1677].

Objection Deadline: September 17, 2021 at 12:00 p.m. (prevailing Eastern Time)

Responses Received: The Debtors have received informal comments from certain counterparties.

Related Documents:

- A. Declaration of Matthew Landess in Support of (A) Debtors' Motion for Entry of an Order Authorizing Debtors To Assume Certain Aircraft Leases and (B) Related Pleadings [ECF No. 1679].
- B. Affidavit of Service of Angharad Bowdler of Epiq Corporate Restructuring, LLC [ECF No. 1715].

Status: This matter is going forward with respect to the aircraft bearing manufacturer's serial number 44426. The Debtors are close to finalizing consensual agreements with the lessors for the remaining two aircraft subject of this motion, bearing manufacturer's serial numbers 43859 and 43861 (collectively, the "**Adjourned Aircraft**"), to assume such leases on amended bases and to settle claims with respect thereto. Accordingly, this matter and the Objection Deadline (solely for those parties for whom the Debtors previously agreed to an extension of the Objection Deadline) are adjourned indefinitely with respect to the Adjourned Aircraft. To the extent a hearing is later necessary on this matter with respect to the Adjourned Aircraft, the Debtors will file a revised notice of hearing which will contain a new hearing date and Objection Deadline (solely for those parties for whom the Debtors previously agreed to an extension of the Objection Deadline) with respect to the Adjourned Aircraft.

6. ***Sealing Motion.*** Debtors' Motion for Entry of an Order Authorizing the Debtors To Partially redact Commercially Sensitive Information [ECF No. 1678].

Objection Deadline: September 17, 2021 at 12:00 p.m. (prevailing Eastern Time)

Responses Received: None.

Related Documents:

A. Declaration of Matthew Landess in Support of (A) Debtors' Motion for Entry of an Order Authorizing Debtors To Assume Certain Aircraft Leases and (B) Related Pleadings [ECF No. 1679].

B. Affidavit of Service of Angharad Bowdler of Epiq Corporate Restructuring, LLC [ECF No. 1715].

Status: The Debtors will file a Certificate of No Objection before the hearing. To the extent a hearing is necessary, this matter is going forward on an uncontested basis.

7. ***Removal Extension Motion.*** Debtors' Third Motion to Extend the Time to File Notices of Removal of Civil Actions [ECF No. 1694].

Objection Deadline: September 17, 2021 at 12:00 p.m. (prevailing Eastern Time)

Responses Received: None.

Related Documents:

A. Affidavit of Service of Angharad Bowdler of Epiq Corporate Restructuring, LLC [ECF No. 1721].

Status: The Debtors will file a Certificate of No Objection before the hearing. To the extent a hearing is necessary, this matter is going forward on an uncontested basis.

8. ***Exclusivity Extension Motion.*** Debtors' Fourth Motion for Entry of an Order Extending the Exclusive Periods Within Which to File a Chapter 11 Plan and Solicit Acceptances Thereof [ECF No. 1700].

Objection Deadline: September 17, 2021 at 12:00 p.m. (prevailing Eastern Time)

Responses Received:

- A. Reservation of Rights of the Official Committee of Unsecured Creditors to Debtors' Fourth Motion for Entry of an Order Extending the Exclusive Periods Within Which to File a Chapter 11 Plan and Solicit Acceptances Thereof [ECF No. 1701].
- B. Reservation of Rights of the Ad Hoc Group of Senior Noteholders with respect to Debtors' Fourth Motion for Entry of an Order Extending the Exclusive Periods within which To File a Chapter 11 Plan and Solicit Acceptances Thereof [ECF No. 1732].
- C. Reservation of Rights of the Ad Hoc Group of Unsecured Claimholders regarding Debtors' Fourth Motion to Extend their Exclusive Periods [ECF No. 1734].
- D. Supplemental Reservation of Rights of the Official Committee of Unsecured Creditors to Debtors' Fourth Motion for Entry of an Order Extending the Exclusive Periods Within Which to File a Chapter 11 Plan and Solicit Acceptances Thereof [ECF No. 1735].

Related Documents:

- A. Affidavit of Service of Angharad Bowdler of Epiq Corporate Restructuring, LLC [ECF No. 1720].

Status: This matter is going forward.

**II. CONTINUED MATTERS:**

- 9. *KPMG Retention Application.*** Debtors Application for an Order Authorizing the Retention and Employment of KPMG Cardenas Dosal, S.C. as Independent Auditor to the Debtors *nunc pro tunc* to the Petition Date [ECF No. 1586].

Objection Deadline: September 13, 2021 at 4:00 p.m. (prevailing Eastern Time)

Responses Received: The Debtors have received informal comments from the U.S. Trustee.

Related Documents:

- A. Affidavit of Service of Angharad Bowdler of Epiq Corporate Restructuring, LLC [ECF No. 1599].

Status: This matter is adjourned to October 1, 2021 at 10:00 a.m. (prevailing Eastern Time).

- 10. *Morris, Nichols, Arsht & Tunnell LLP's Third Interim Fee Application.*** Third Application for Interim Professional Compensation of Morris, Nichols, Arsht &

Tunnell LLP for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Co-Counsel to the Debtors and Debtors In Possession for the Period from January 1, 2021 Through April 30, 2021 [ECF No. 1311].

Objection Deadline: September 13, 2021 at 4:00 p.m. (prevailing Eastern Time)

Responses Received: The Debtors have had informal discussions with the U.S. Trustee.

Related Documents:

A. Notice of Interim Fee Application Hearing [ECF No. 1528].

B. Affidavit of Service of Angharad Bowdler of Epiq Corporate Restructuring, LLC [ECF No. 1315].

Status: This matter is adjourned to October 1, 2021 at 10:00 a.m. (prevailing Eastern Time).

**11. *Skyworks Capital, LLC's Third Interim Fee Application.*** Third Application for Interim Professional Compensation of Skyworks Capital, LLC for Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred as Aircraft Fleet Restructuring Financial Advisor for the Debtors and Debtors In Possession for The Period From January 1, 2021 Through April 30, 2021 [ECF No. 1313].

Objection Deadline: September 13, 2021 at 4:00 p.m. (prevailing Eastern Time)

Responses Received: The Debtors have had informal discussions with the U.S. Trustee.

Related Documents:

A. Notice of Interim Fee Application Hearing [ECF No. 1528].

B. Affidavit of Service of Angharad Bowdler of Epiq Corporate Restructuring, LLC [ECF No. 1324].

Status: This matter is adjourned to October 1, 2021 at 10:00 a.m. (prevailing Eastern Time).

**12. *White & Case LLP's Third Interim Fee Application.*** Third Application for Interim Professional Compensation / Third Interim Fee Application of White & Case LLP, as Special Aviation Counsel to the Debtors, for Allowance and Payment of Compensation for Professional Services Rendered and Reimbursement of Actual and

Necessary Expenses incurred from January 1, 2021 through and including April 30, 2021 [ECF No. 1327].

Objection Deadline: September 13, 2021 at 4:00 p.m. (prevailing Eastern Time)

Responses Received: The Debtors have had informal discussions with the U.S. Trustee.

Related Documents:

A. Notice of Interim Fee Application Hearing [ECF No. 1528].

Status: This matter is adjourned to October 1, 2021 at 10:00 a.m. (prevailing Eastern Time).

**13. *Sainz Abogados, S.C.'s Second Interim Fee Application.*** Second Application for Interim Professional Compensation of Sainz Abogados, S.C. for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Special Mexican Counsel to the Debtors and Debtors In Possession for the Period from January 1, 2021 Through April 30, 2021 [ECF No. 1328].

Objection Deadline: September 13, 2021 at 4:00 p.m. (prevailing Eastern Time)

Responses Received: The Debtors have had informal discussions with the U.S. Trustee.

Related Documents:

A. Notice of Interim Fee Application Hearing [ECF No. 1528].

B. Affidavit of Service of Angharad Bowdler of Epiq Corporate Restructuring, LLC [ECF No. 1341].

Status: This matter is adjourned to October 1, 2021 at 10:00 a.m. (prevailing Eastern Time).

**14. *Rothschild & Co US Inc. and Rothschild & Co Mexico S.A. de C.V., Third Interim Fee Application.*** Third Application for Interim Professional Compensation of Rothschild & Co US Inc. and Rothschild & Co Mexico S.A. De C.V., as Investment Bankers for the Debtors and Debtors In Possession, for Allowance and Payment of Compensation for Professional Services Rendered and for Reimbursement of Actual and Necessary Expenses Incurred from January 1, 2021 Through April 30, 2021 [ECF No. 1329].

Objection Deadline: September 13, 2021 at 4:00 p.m. (prevailing Eastern Time)



Responses Received: The Debtors have had informal discussions with the U.S. Trustee.

Related Documents:

- A. Notice of Interim Fee Application Hearing [ECF No. 1528].
- B. Affidavit of Service of Angharad Bowdler of Epiq Corporate Restructuring, LLC [ECF No. 1341].

Status: This matter is adjourned to October 1, 2021 at 10:00 a.m. (prevailing Eastern Time).

**15. *Alixpartners, LLP's Third Interim Fee Application.*** Third Interim Fee Application of Alixpartners, LLP and Alixpartners International, Inc., Financial Advisor to the Chapter 11 Debtors, for Allowance of Compensation for Professional Services Rendered for the Period January 1, 2021 Through April 30, 2021 [ECF No. 1339].

Objection Deadline: September 13, 2021 at 4:00 p.m. (prevailing Eastern Time)

Responses Received: The Debtors have had informal discussions with the U.S. Trustee.

Related Documents:

- A. Notice of Interim Fee Application Hearing [ECF No. 1528].
- B. Affidavit of Service of Angharad Bowdler of Epiq Corporate Restructuring, LLC [ECF No. 1362].

Status: This matter is adjourned to October 1, 2021 at 10:00 a.m. (prevailing Eastern Time).

**16. *Davis Polk & Wardwell LLP's Third Interim Fee Application.*** Third Interim Application of Davis Polk & Wardwell LLP for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Counsel to the Debtors and Debtors in Possession for the Period from January 1, 2021 through April 30, 2021 [ECF No. 1346].

Objection Deadline: September 13, 2021 at 4:00 p.m. (prevailing Eastern Time)

Responses Received: The Debtors have had informal discussions with the U.S. Trustee.

Related Documents:

- A. Notice of Interim Fee Application Hearing [ECF No. 1528].

B. Affidavit of Service of Angharad Bowdler of Epiq Corporate Restructuring, LLC [ECF No. 1362].

Status: This matter is adjourned to October 1, 2021 at 10:00 a.m. (prevailing Eastern Time).

**17. *Santamarina y Steta, S.C.'s Second Interim Fee Application.*** Amended Application for Interim Professional Compensation (Second) of Santamarina y Steta, S.C. as Mexican Counsel for the Official Committee of Unsecured Creditors for Compensation and Reimbursement of Expenses Incurred for the Period January 1, 2021 through April 30, 2021 [ECF No. 1346].

Objection Deadline: September 13, 2021 at 4:00 p.m. (prevailing Eastern Time)

Responses Received: The Debtors have had informal discussions with the U.S. Trustee.

Related Documents:

- A. Second Application for Interim Professional Compensation of Santamarina y Steta, S.C. as Counsel for the Official Committee of Unsecured Creditors for Compensation and Reimbursement of Expenses Incurred for the Period January 1, 2021 through April 30, 2021 [ECF No. 1346].
- B. Notice of Interim Fee Application Hearing [ECF No. 1528].
- C. Affidavit of Service of Angharad Bowdler of Epiq Corporate Restructuring, LLC [ECF No. 1562].

Status: This matter is adjourned to October 1, 2021 at 10:00 a.m. (prevailing Eastern Time).

**18. *FTI Consulting, Inc.'s Third Interim Fee Application.*** Third Application for Interim Professional Compensation of FTI Consulting, Inc., Financial Advisor to the Official Committee of Unsecured Creditors for Interim Allowance of Compensation and Reimbursement of Expenses for the Period from January 1, 2021 through April 30, 2021 [ECF No. 1349].

Objection Deadline: September 13, 2021 at 4:00 p.m. (prevailing Eastern Time)

Responses Received: The Debtors have had informal discussions with the U.S. Trustee.

Related Documents:

A. Notice of Interim Fee Application Hearing [ECF No. 1528].

B. Affidavit of Service of Angharad Bowdler of Epiq Corporate Restructuring, LLC [ECF No. 1362].

Status: This matter is adjourned to October 1, 2021 at 10:00 a.m. (prevailing Eastern Time).

**19. Morrison & Foerster LLP's Third Interim Fee Application.** Third Interim Application of Morrison & Foerster LLP as Special Counsel for the Official Committee of Unsecured Creditors for Compensation and Reimbursement of Expenses Incurred for the Period January 1, 2021 through April 30, 2021 [ECF No. 1349].

Objection Deadline: September 13, 2021 at 4:00 p.m. (prevailing Eastern Time)

Responses Received: The Debtors have had informal discussions with the U.S. Trustee.

Related Documents:

A. Notice of Interim Fee Application Hearing [ECF No. 1528].

B. Affidavit of Service of Geoff Zahm of Epiq Corporate Restructuring, LLC [ECF No. 1460].

Status: This matter is adjourned to October 1, 2021 at 10:00 a.m. (prevailing Eastern Time).

**20. Lee Group PLLC's First Interim Fee Application.** First Interim Application of the Lee Group PLLC for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Special Airline Transaction Counsel to the Debtors and Debtors In Possession for the Period from April 15, 2021 Through May 31, 2021 [ECF No. 1448].

Objection Deadline: September 13, 2021 at 4:00 p.m. (prevailing Eastern Time)

Responses Received: The Debtors have had informal discussions with the U.S. Trustee.

Related Documents:

A. Notice of Interim Fee Application Hearing [ECF No. 1528].

B. Affidavit of Service of Angharad Bowdler of Epiq Corporate Restructuring, LLC [ECF No. 1465].

Status: This matter is adjourned to October 1, 2021 at 10:00 a.m. (prevailing Eastern Time).

**21. *De La Vega & Martinez Rojas, S.C.'s First Interim Fee Application.*** First Application for Interim Professional Compensation of De La Vega & Martinez Rojas, S.C. for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Special Labor Counsel to the Debtors and Debtors In Possession for the Period from April 30, 2021 Through May 31, 2021 [ECF No. 1664].

Objection Deadline: September 13, 2021 at 4:00 p.m. (prevailing Eastern Time)

Responses Received: The Debtors have had informal discussions with the U.S. Trustee.

Related Documents:

A. Affidavit of Service of Angharad Bowdler of Epiq Corporate Restructuring, LLC [ECF No. 1674].

Status: This matter is adjourned to October 1, 2021 at 10:00 a.m. (prevailing Eastern Time).

Dated: September 17, 2021  
New York, New York

DAVIS POLK & WARDWELL LLP

By: /s/ Timothy Graulich

450 Lexington Avenue  
New York, New York 10017  
Telephone: (212) 450-4000  
Facsimile: (212) 701-5800  
Marshall S. Huebner  
Timothy Graulich  
James I. McClammy  
Stephen D. Piraino  
Erik P. Jerrard (admitted *pro hac vice*)

*Counsel to the Debtors  
and Debtors in Possession*